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Filing date: **03/14/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91225615
Party	Defendant Velocity Global, LLC
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Date	03/14/2016
Attachments	Answer to Notice of Opposition.pdf(15517 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Paylocity Corporation, Opposer, v. Velocity Global LLC, Applicant.	Opposition No.: 91225615 Mark: VELOCITY GLOBAL Serial No.: 86594253
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ANSWER TO NOTICE OF OPPOSITION

Applicant Velocity Global LLC (“Applicant”), by and through its counsel,
responds as follows to the Notice of Opposition:

Description of Applicant’s Application

In response to this section of Applicant’s Notice of Opposition, Applicant states that U.S. Trademark Application Ser. No. 86594253 (the “Application”), and the accompanying TSDR record¹ speaks for itself.

Grounds for Opposition

In response to Opposer’s allegations, Applicant states as follows:

1. Applicant states that Opposer’s U.S. Trademark Registration No. 3326870 speaks for itself with respect to the application and registration dates, and the goods covered. Applicant denies the statements in the last sentence of paragraph 1. Applicant lacks sufficient knowledge and information to form a belief as to the truth of all

remaining allegations contained in paragraph 1 of the Notice of Opposition and therefore denies them.

2. Applicant states that Opposer's U.S. Trademark Registration No. 3867921 speaks for itself with respect to the application and registration dates, and the goods covered. Applicant denies the statements in the last sentence of paragraph 2. Applicant lacks sufficient knowledge and information to form a belief as to the truth of all remaining allegations contained in paragraph 2 of the Notice of Opposition and therefore denies them.

3. Applicant states that Opposer's Reg. No. 3867922 speaks for itself with respect to the application and registration dates, and the goods covered. Applicant denies the statements in the last sentence of paragraph 3. Applicant lacks sufficient knowledge and information to form a belief as to the truth of all remaining allegations contained in paragraph 3 of the Notice of Opposition and therefore denies them.

4. Applicant denies the statements in the last sentence of paragraph 4. Applicant lacks sufficient knowledge and information to form a belief as to the truth of all remaining allegations contained in paragraph 4 of the Notice of Opposition and therefore denies them.

5. Applicant denies the statements in the last sentence of paragraph 5. Applicant lacks sufficient knowledge and information to form a belief as to the truth of

¹ Available at http://tsdr.uspto.gov/#caseNumber=86594253&caseType=SERIAL_NO&searchType=statusSearch.

all remaining allegations contained in paragraph 5 of the Notice of Opposition and therefore denies them.

AFFIRMATIVE DEFENSES
FIRST DEFENSE
(Failure to State a Claim)

The Notice of Opposition fails to state a claim upon which relief can be granted.

WHEREFORE, Applicant respectfully requests that the Board dismiss this opposition and allow the Application to proceed to registration on the Principal Register.

Dated: March 14, 2016

Respectfully submitted,

/s/ Emily J. Cooper

Emily J. Cooper

Darin L. Brown

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ATTORNEYS FOR APPLICANT
VELOCITY GLOBAL, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2016, I served a copy of the above ANSWER TO NOTICE OF OPPOSITION to the following by e-mail, as agreed by counsel:

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/s/ Mark Moore

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